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*Attorneys for Defendant  
Allegiant Air, LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Case No. 2:20-cv-00437-RFB-DJA

ALI BAHREMAN,

Plaintiff,

v.

ALLEGiant AIR, L.L.C. and  
TRANSPORT WORKERS UNION OF  
AMERICA LOCAL 577,

Defendants.

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DEFENDANTS  
TO RESPOND TO PLAINTIFF'S  
COMPLAINT**

**(FIRST REQUEST)**

IT IS HEREBY STIPULATED by and between Plaintiff ALI BAHREMAN ("Plaintiff"), through his counsel, Marquis Aurbach Coffing, Defendant, ALLEGiant AIR, L.L.C. ("Allegiant"), by and through its counsel, Jackson Lewis P.C., and Defendant TRANSPORT WORKERS UNION OF AMERICA LOCAL 577 ("TWUA") by and through its counsel, McCracken, Stemerman & Holsberry, and Phillips, Richard & Rind, P.A., (collectively, Allegiant and TWUA are "Defendants"), that Defendants shall have a 45-day extension up to and including

1 May 14, 2020, in which to file their respective responses to Plaintiff's Complaint. This Stipulation  
2 is submitted and based upon the following:

3 1. Plaintiff filed his Complaint on March 2, 2020. ECF No. 1. Defendants were served  
4 with the Complaint on March 9, 2020.

5 2. Defendants' responses to the Complaint are currently due on March 30, 2020.

6 3. Due to the press of other matters, including adjustments made necessary by the  
7 COVID-19 pandemic, and in order to respond to the pleading, counsel for Defendants require  
8 additional time. Counsel for Defendants request a forty-five (45) day extension, up to and including  
9 May 14, 2020, to file their respective responses to Plaintiff's Complaint.

10 4. This is the first request for an extension of time for Defendants to file a response to  
11 Plaintiff's Complaint.

12 5. This request is made in good faith and not for the purpose of delay.

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6. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim and/or defense held by any party.

Dated this 24<sup>th</sup> day of March, 2020.

**JACKSON LEWIS P.C.**

/s/ Joshua A. Sliker

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*Attorneys for Plaintiff Ali Bahreman*

**IT IS SO ORDERED.**



United States Magistrate Judge

Dated: March 26, 2020